## NHDES

## The State of New Hampshire

## DEPARTMENT OF ENVIRONMENTAL SERVICES



## Thomas S. Burack, Commissioner

February 5, 2010

Mr. John MacDonald Vice President – Generation Northeast Utilities Public Service of New Hampshire 780 North Commercial Street Manchester, NH 03101

Re: Request for Additional Information for Determination of Baseline Mercury Input

Dear Mr. MacDonald:

In a letter dated October 29, 2009, the New Hampshire Department of Environmental Services, Air Resources Division (DES) requested additional information from Public Service of New Hampshire (PSNH) regarding data necessary for verifying baseline mercury input data. In a letter dated November 30, 2009, PSNH submitted some, but not all, of the information requested. In order to finalize the review and determination of the baseline mercury input as defined in New Hampshire RSA 125-O:12, III, DES requests that PSNH submit by **March 8, 2010** all of the information as originally requested and outlined below and clarify any information as indicated below:

1. In the letter dated November 30, 2009 from PSNH to DES, response 3 and the attached tables show coal burned at Schiller by Pile A, Pile B, etc. Provide the name of the coal mine associated with the coal in each pile. For example, please list each pile name and each coal mine name in the response:

Pile A: Paso Diablo, Pocohontas, Mina Norte.

- In the letter dated November 30, 2009 from PSNH to DES regarding response 5, provide
  the analytical data for coal shipments to both Merrimack Station and Schiller Station for
  December 2006. Data indicates that PSNH received shipments, but no analytical data has
  been provided.
- 3. In the letter dated November 30, 2009 from PSNH to DES regarding response 5, provide the analytical data for coal shipments received from the Pocohontas mine for 2008. Data indicates that PSNH received shipments from the Pocohontas mine, but no analytical data has been provided.
- 4. In the letter dated November 30, 2009 from PSNH to DES regarding response 6, provide the name(s) of the mines associated with the categories of coal burned for Merrimack. Please provide the **mine names** associated with <u>each</u> of the categories provided and repeated below:

- From the tables with data through 2006: 1) High sulfur, 2) mid sulfur, 3) low sulfur/mercury Venezuelan test, 4) low sulfur/mercury Pocohontas test, 5) low sulfur/mercury Russian test, and 6) low sulfur/mercury Indonesian test; and
- From the tables with data for 2007 and 2008 1) A-Mid Sulfur, B-High Sulfur, C-Low Sulfur, D-PRB-Low Sulfur, and E-Low Sulfur.

For example, 1) High sulfur: Loveridge, Blackville, Nelms, Emerald; 2) Mid sulfur: Bailey, Pocohontas, etc.

- 5. In the letter dated November 30, 2009 from PSNH to DES regarding response 8, PSNH stated that moisture content of the coal is not factored into the coal consumption data or the baseline mercury input calculation. The method used for the analysis of the mercury in the coal presents the results in the mercury content of the coal on a dry basis (parts per million by dry weight). Please explain how you can disregard the moisture or alternatively, please recalculate the baseline mercury input taking into account the moisture content of the coal.
- 6. In the letter dated November 30, 2009 from PSNH to DES regarding response 8, PSNH stated, "Baseline mercury input was calculated in accordance with RSA 125-O:14." Please provide the actual equation used, and provide an example.
- 7. Please submit the fuel receipt data for Schiller Station for 2008 in accordance with TV-OP-053, Condition VIII., J, Table 11, Item 11.

As indicated in the previous letter, DES intends to finalize its review of this data and make a determination of the baseline mercury input in accordance with NH RSA 125-O:14, I. Once the review is completed, DES will issue a draft determination that will be available on the DES website and will be available for public comment. A final determination regarding this matter will be made once all relative public comments have been considered.

If you have any questions concerning this matter, please contact Elizabeth Nixon of the Air Resources Division, Permitting & Environmental Health Bureau, by phone at (603) 271-0883 or by e-mail at <a href="mailto:elizabeth.nixon@des.nh.gov">elizabeth.nixon@des.nh.gov</a>. We would be happy to meet with you to discuss this further, if you'd like.

Sincerely,

Robert R. Scott

Director

Air Resources Division

By certified mail # 7007 2560 0001 3868 0160

cc: William Smagula, PSNH Lynn Tillotson, PSNH Laurel Brown, PSNH